Andy Lachance Assistant General Counsel



Verizon 1300 I Street, NW Suite 400 West Washington, DC 20005 (202) 515-2439

August 17, 2015

Marlene H. Dortch Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: NTCH, Inc. v. Cellco Partnership d/b/a Verizon Wireless, EB Docket No. 14-212,

File No. EB-13-MD-006

Dear Ms. Dortch:

Attached is Verizon's response to certain of NTCH's supplemental interrogatories in the above-captioned proceeding. Specifically, Verizon is responding to NTCH supplemental interrogatory Number 2 and Number 7, as modified by the Enforcement Bureau's July 24, 2015 letter. Verizon has determined that certain information contained in the attached should be treated as Highly Confidential. Verizon is filing both redacted and public versions of the requested information with the Commission and will provide both versions to NTCH pursuant to the terms of the Protective Order.

Please contact the undersigned with any questions.

Sincerely,

Andre J. Lachance

cc: Christopher Killion, Chief, Market Disputes Resolution Division
Rosemary McEnery, Deputy Chief, Market Disputes Resolution Division

Lisa Boehley

¹ See Letter from Rosemary McEnery, Deputy Chief, Market Disputes Resolution Division, Enforcement Bureau, FCC, to Donald J. Evans, Fletcher, Heald & Hildreth, P.L.C., and Andre J. Lachance, Verizon Wireless, EB Docket No. 14-212, File No. EB-13-MD-006 (Jul. 24, 2015) ("EB Jul. 24, 2015 Letter").

² EB Jul. 24, 2015 Letter at 2-3.

VERIZON'S RESPONSE TO NTCH'S SUPPLEMENTAL INTERROGATORIES

1.	Describe and quantify the [BEGIN HIGHLY CONFIDENTIAL] [END HIGHLY CONFIDENTIAL] charged to MVNO
	partners mentioned in Response #3 of VZW's Response to NTCH's Interrogatories ("VZW's Response"). For all MNVO agreements [BEGIN HIGHLY CONFIDENTIAL]
	[END
	HIGHLY CONFIDENTIAL] (Supplemental interrogatory 2)
	RESPONSE: [BEGIN HIGHLY CONFIDENTIAL]
	[END HIGHLY CONFIDENTIAL]

2. For any agreement on which VZW claims to be a Net Payer, note whether this characterization is true for both voice and data independently or only in the aggregate. (Supplemental interrogatory 7)

RESPONSE: See attached Exhibit A.

Exhibit A

CDIVIA	ONLY Ca	mers									Total Voice Vo	lumes 1Q 2015	,		
		VZW 3G Rever	nue Rates (I	nbound on VZV	v)	VZW	3G COST RA	TES (Outbou	ind on Roam Ca	rrier)	VZW Inbound	VZW Outbound	Voice	Data	Total
ARRIER # LR	RA Voice Air	Dom Toll	1X DATA	EVDO DATA	5MS	Volce Air	Dom Toll	1X DATA	EVDO DATA	SMS	Voice Air MOU	Voice Air MOU	NET PAYER OR NET RECEIVER (based on Total Voice \$) ExcLLRA \$	MET PAYER OR MET RECEIVER (based on Total Data \$) Excl.LRA \$	NET PAYER OR N RECEIVER (based Total \$) Excl.LRA
1 2															
4									240 32						
5 6 7															
8				227/					200						
9	5														
11															
13 14			5-a					() ()							
15 16															
17 18				P3	i i				7 704						
19 20															
21 22															
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25 26	* 1		717 711												
28 29															
30 32															
33							200								
35	515		-												
36 38	- 0		0200												
40 41															
42															
45		1 ==				A									
46								0.00							
49 50	2														
51	-			- Ni					-						
52 53	5.														

CDM	A C	NLY Ca	rriers				1					Total Voice Vo	lumes 1Q 2015	r		1
			VZW 3G Reve	enue Rates (Inbound on VZW)		vzw	/ 3G COST RA	TES (Outbo	und on Roam Ca	rrier)	VZW Inbound	VZW Outbound	Voice	Data	Total
CARRIER N	LRA	Voice Air	Dom Toll	1X DATA	EVDO DATA	SMS	Voice Air	Dom Toll	1X DATA	EVDO DATA	SMS	Voice Air MOU	Voice Air MOU	Total Voice \$) Excl.LRA	NET PAYER OR NET RECEIVER (based on Total Data \$) Excl.LRA \$	NET PAYER OR NET RECEIVER (based on Total \$) Excl.LRA \$
55																
56	22						10									
57	- 23	10 N														
58	100		9				85									
59	87			7								l .		4		
60							3									

CDMA Car	riers W	ith LTE													,				Total Voice Vo	lumes 10 2015			
		VZW 3G Rev	renue Races (le	shound on VIWI	É	VZW	4G Revenue	Rates (Inbour	d on VZW)	VŽ	W 3G COST R	ATES (Outbo	und on Roam C	ander)	V2W 4G	Cost Rates (O	utbound on Ac	sam Carrier)	VZW tribound	YZW Outbound	Volce	Dece	Total
CARRIER # LAA	Voice Air	Dom Toll	1X DATA	EVDO BATA	SMS	VOLTE AIR		LTE DATA pe	er SMS - per MO	Voice Air	Dom Tall	1KDATA	EVDO BATA	SMES	VOLTE AIR per MOU	VOLTE Tall Per Mou	LTE DATA per		Voice Air MOU		RECEIVER (based on Total Voice \$) Excited \$	RECEIVER (based on	NET PAYER OR NET
1 2																							

GSM Agreements

			VZW Reven	ue Rates (In	bound on VZW)		VZW	3G COST RA	TES (Outbo	und on Roam Ca	ırrier)
CARRIER #	LRA	Voice Air per MOU	Dom Toll - Per MOU	DATA per MB	SMS - per MO	SMS- per MT	Voice Air per MOU	Dom Toll - Per MOU	DATA per MB	SMS - per MO	SMS- per MT
1						To maintenance of the control of the					
2											
3											
4	1										
5	1										

	Volumes 1Q 015
vzw	VZW
Inbound	Outbound

Voice Air MOU

Voice Air

MOU

Voice	Data	Total
NET PAYER OR	NET PAYER OR	Letter London
NET RECEIVER	NET RECEIVER	NET PAYER OR
(based on Total	(based on Total	NET RECEIVER
Voice \$) Excl.LRA	Data \$) Excl.LRA	(based on Total
\$	\$	S) Excl.LRAS

DECLARATION OF DONALD II. MANLEY

- My name is Donald H. Manley, and I work for Verizon. In my current position, my responsibilities include negotiating and maintaining Verizon Wireless's wholesale and MVNO agreements.
- The purpose of my declaration is to certify portions of Verizon's response to NTCH's
 supplemental interrogatories in NTCH v. Cellco Partnership d/b/a Verizon Wireless, EB
 Docket No. 14-212, File No. EB-13-MD-006. Specifically, I am certifying the
 information provided in Response 1.
- I have reviewed the information provided in Verizon's response to NTCH's
 Interrogatories and declare, under penalty of perjury, that the information is true and
 correct based on information available to me.

Dated: /JV90

_, 2015

Donald H. Manley

DECLARATION OF JOSEPH TRENT

- My name is Joseph Trent, and I work for Verizon. In my current position, my responsibilities include negotiating and maintaining Verizon Wireless's roaming agreements.
- The purpose of my declaration is to certify portions of Verizon's response to NTCH's
 supplemental interrogatories in NTCH v. Cellco Partnership d/b/a Verizon Wireless, EB
 Docket No. 14-212, File No. EB-13-MD-006. Specifically, I am certifying the
 information provided in Response 2.
- I have reviewed the information provided in Verizon's response to NTCH's
 Interrogatories and declare, under penalty of perjury, that the information is true and correct based on information available to me.

Dated: August 17, 2015

Joseph Trent

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of August, 2015, copies of the foregoing letter and all attachments thereto were delivered by hand to the following individuals:

Donald J. Evans Jonathan R. Markman Fletcher, Heald & Hildreth, P.L.C. 1300 N. 17th Street, Suite 1100 Arlington, VA 22209

> /s/ Sarah F. Trosch